

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

IN RE:)	
)	
TAYLOR MADISON FRANCOIS BODINE)	Case No. 21-11238-KHK
)	Chapter 7
Debtor)	
_____)	
)	
LANI HAY,)	
)	
Plaintiff)	
)	
v.)	Adversary Proceeding
)	No. 21-01056-KHK
TAYLOR MADISON FRANCOIS BODINE)	
)	
Debtor)	
_____)	

**CONSENT ORDER GRANTING
CONSENT MOTION FOR AMENDED DISCOVERY PLAN**

Upon the Consent Motion for Amended Discovery Plan (the “Motion”) filed by the Plaintiff, Lani Hay, and Debtor, Taylor Madison Francoise Bodine (the “Parties”), by counsel, and it appearing that the Motion should be granted, it is hereby

ORDERED, that the Motion is granted; and it is further

ORDERED, that the Discovery Plan contained in the Initial Scheduling Order (Doc. No. 4 “Scheduling Order”) is amended as follows:

- a. The initial disclosures shall be due 30 days after the United States Trustee’s Bankruptcy Rule 2004 exam concludes or the Debtor’s Answer is filed, whichever is later.
- b. The parties shall make expert witness disclosures required by Fed. R. Civ. P. 26(a)(2), except rebuttal expert witness disclosures, not later than 50 days after

the United States Trustee's Bankruptcy Rule 2004 exam concludes or the Debtor's Answer is filed, whichever is later. Rebuttal expert witnesses shall be made within 80 days after the United States Trustee's Bankruptcy Rule 2004 exam concludes or the Debtor's Answer is filed, whichever is later.

- c. All discovery shall be concluded within 120 days after the United States Trustee's Bankruptcy Rule 2004 exam concludes or the Debtor's Answer is filed, whichever is later.
- d. Dispositive motions shall be filed within 30 days after the conclusion of discovery.
- e. The length of the trial is to be discussed and determined by the Court and the Parties at a later time.
- f. Dates for filing of the pretrial statement, witness lists, pre-filing of exhibits, the pretrial conference and the trial date shall be set by the Court and the Parties at a later time.
- g. In the event any filing deadline falls on a weekend or Court holiday, the deadline shall be extended to the next business day.

ORDERED, that the discovery plan contained in this Order may be amended by further Order of this Court.

Date: _____, 2021

Hon. Klinette H. Kindred
United States Bankruptcy Judge

Entered on the Docket: _____

I ASK FOR THIS:

/s/ Benjamin P. Smith
Benjamin P. Smith (VSB 90430)
William B. Schroeder (VSB 43179, *pro hac vice* pending)
Shulman, Rogers, Gandal, Pordy & Ecker, P.A.
12505 Park Potomac Avenue, Suite 600
Potomac, Maryland 20854
TEL: (301) 230-5200
FAX: (301) 230-2891
Email: bsmith@shulmanrogers.com
wschroeder@shulmanrogers.com
Counsel for the Plaintiff

I ASK FOR THIS:

/s/Stephen E. Leach
Stephen E. Leach (Va. Bar No. 20601)
Hirschler Fleischer, PC
8270 Greensboro Drive, Suite 700
Tysons, Virginia 22102
Telephone: (703) 584-8902
Email: sleach@hirschlerlaw.com
Counsel for Taylor Madison Francois Bodine

CERTIFICATION OF ENDORSEMENT
UNDER LOCAL BANKRUPTCY RULE 9022-1(C)

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Benjamin P. Smith
Benjamin P. Smith